

EXHIBIT A

Jonathan Shaw (Dhillon Law)

From: John Anthony Castro <j.castro@johncastro.com>
Sent: Tuesday, October 17, 2023 6:41 PM
To: Jonathan Shaw (Dhillon Law)
Cc: 'Bryan Gould'; 'barnardb@cwbp.com'; 'tomaoc@cwbp.com'; David Warrington (Dhillon Law); Mark Meuser (Dhillon Law); 'gossil@cwbp.com'; 'Richard Lehmann'; 'Morgan G. Tanafon'; 'Garland, Samuel'; 'Tekin, Jill'; 'O'Donnell, Brendan'
Subject: RE: Castro v. NH Secretary of State & Mr. Trump--Castro's Proposed Witness List
Importance: Low

External Email

Noted.



John Anthony Castro
2024 Republican Presidential Candidate
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From: Jonathan Shaw (Dhillon Law) <JShaw@dhillonlaw.com>
Sent: Tuesday, October 17, 2023 5:40 PM
To: John Anthony Castro <j.castro@johncastro.com>
Cc: 'Bryan Gould' <gouldb@cwbp.com>; 'barnardb@cwbp.com' <barnardb@cwbp.com>; 'tomaoc@cwbp.com' <tomaoc@cwbp.com>; David Warrington (Dhillon Law) <DWarrington@dhillonlaw.com>; Mark Meuser (Dhillon Law) <mmeuser@dhillonlaw.com>; 'gossil@cwbp.com' <gossil@cwbp.com>; 'Richard Lehmann' <rick@nhlawyer.com>; 'Morgan G. Tanafon' <TanafonM@cwbp.com>; 'Garland, Samuel' <Samuel.RV.Garland@doj.nh.gov>; 'Tekin, Jill' <Jill.Tekin@doj.nh.gov>; 'O'Donnell, Brendan' <Brendan.A.Odonnell@doj.nh.gov>
Subject: RE: Castro v. NH Secretary of State & Mr. Trump--Castro's Proposed Witness List

Then we do not have an agreement and I will be filing an opposition to your motion tomorrow.

Jonathan M. Shaw | Partner | DHILLON LAW GROUP

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SAN FRANCISCO ADDRESS:

177 Post Street, Suite 700

San Francisco, California 94108

Phone: 415.433.1700 | Fax: 415.520.6593

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From: John Anthony Castro <j.castro@johncastro.com>

Sent: Tuesday, October 17, 2023 6:31 PM

To: Jonathan Shaw (Dhillon Law) <JShaw@dhillonlaw.com>

Cc: 'Bryan Gould' <gouldb@cwbp.com>; 'barnardb@cwbp.com' <barnardb@cwbp.com>; 'tomaoc@cwbp.com' <tomaoc@cwbp.com>; David Warrington (Dhillon Law) <DWarrington@dhillonlaw.com>; Mark Meuser (Dhillon Law) <mmeuser@dhillonlaw.com>; 'gossil@cwbp.com' <gossil@cwbp.com>; 'Richard Lehmann' <rick@nhlawyer.com>; 'Morgan G. Tanafon' <TanafonM@cwbp.com>; 'Garland, Samuel' <Samuel.RV.Garland@doj.nh.gov>; 'Tekin, Jill' <Jill.Tekin@doj.nh.gov>; 'O'Donnell, Brendan' <Brendan.A.Odonnell@doj.nh.gov>

Subject: RE: Castro v. NH Secretary of State & Mr. Trump--Castro's Proposed Witness List

Importance: High

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Jonathan,

Perfect, I need to add that my agreement is also conditioned on you and your client agreeing that, other than the Political Question Doctrine, there are no other grounds for claiming the Court lacks jurisdiction to hear the case.

I understand you have addressed the self-executing nature of Section 3 of the 14th Amendment, but that goes to whether a claim upon which relief can be granted has been asserted.

Please confirm there are no other grounds, other than the Political Question Doctrine cited in your client's Motion to Dismiss, that you intend to raise. The reason is quite evident: if you raise new grounds, I may need your client available to provide testimony. If you can also confirm there are no other grounds, we can proceed. If not, please consider the PDF I sent to be null and void.



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From: Jonathan Shaw (Dhillon Law) <JShaw@dhillonlaw.com>
Sent: Tuesday, October 17, 2023 5:14 PM
To: John Anthony Castro <j.castro@johncastro.com>
Cc: 'Bryan Gould' <gouldb@cwbpba.com>; 'barnardb@cwbpba.com' <barnardb@cwbpba.com>; 'tomaoc@cwbpba.com' <tomaoc@cwbpba.com>; David Warrington (Dhillon Law) <DWarrington@dhillonlaw.com>; Mark Meuser (Dhillon Law) <mmeuser@dhillonlaw.com>; 'gossil@cwbpba.com' <gossil@cwbpba.com>; 'Richard Lehmann' <rick@nhlawyer.com>; 'Morgan G. Tanafon' <TanafonM@cwbpba.com>; 'Garland, Samuel' <Samuel.RV.Garland@doj.nh.gov>; 'Tekin, Jill' <Jill.Tekin@doj.nh.gov>; 'O'Donnell, Brendan' <Brendan.A.Odonnell@doj.nh.gov>
Subject: Re: Castro v. NH Secretary of State & Mr. Trump--Castro's Proposed Witness List

Unfortunately, I am not in a position to print and sign at the moment, but will do so when I can.

Jonathan M. Shaw | Partner | DHILLON LAW GROUP

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Member of the Bars of Maryland, Virginia, and the District of Columbia.

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From: John Anthony Castro <j.castro@johncastro.com>
Sent: Tuesday, October 17, 2023 6:10:51 PM
To: Jonathan Shaw (Dhillon Law) <JShaw@dhillonlaw.com>
Cc: 'Bryan Gould' <gouldb@cwbpba.com>; 'barnardb@cwbpba.com' <barnardb@cwbpba.com>; 'tomaoc@cwbpba.com' <tomaoc@cwbpba.com>; David Warrington (Dhillon Law) <DWarrington@dhillonlaw.com>; Mark Meuser (Dhillon Law) <mmeuser@dhillonlaw.com>; 'gossil@cwbpba.com' <gossil@cwbpba.com>; 'barnardb@cwbpba.com' <barnardb@cwbpba.com>; 'Richard Lehmann' <rick@nhlawyer.com>; 'Morgan G. Tanafon' <TanafonM@cwbpba.com>; 'Garland, Samuel' <Samuel.RV.Garland@doj.nh.gov>; 'Tekin, Jill' <Jill.Tekin@doj.nh.gov>; 'O'Donnell, Brendan' <Brendan.A.Odonnell@doj.nh.gov>
Subject: RE: Castro v. NH Secretary of State & Mr. Trump--Castro's Proposed Witness List

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Upon execution, I will withdraw the motion as to Defendant Donald John Trump.



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From: Jonathan Shaw (Dhillon Law) <JShaw@dhillonlaw.com>

Sent: Tuesday, October 17, 2023 10:02 AM

To: John Anthony Castro <j.castro@johncastro.com>

Cc: 'Bryan Gould' <gouldb@cwbp.com>; 'barnardb@cwbp.com' <barnardb@cwbp.com>; 'tomaoc@cwbp.com' <tomaoc@cwbp.com>; David Warrington (Dhillon Law) <DWarrington@dhillonlaw.com>; Mark Meuser (Dhillon Law) <mmeuser@dhillonlaw.com>; 'gossil@cwbp.com' <gossil@cwbp.com>; 'barnardb@cwbp.com' <barnardb@cwbp.com>; 'Richard Lehmann' <rick@nhlawyer.com>; 'Morgan G. Tanafon' <TanafonM@cwbp.com>; 'Garland, Samuel' <Samuel.RV.Garland@doj.nh.gov>; 'Tekin, Jill' <Jill.Tekin@doj.nh.gov>; 'O'Donnell, Brendan' <Brendan.A.Odonnell@doj.nh.gov>

Subject: RE: Castro v. NH Secretary of State & Mr. Trump--Castro's Proposed Witness List

Mr. Castro,

Here is a draft stipulation as discussed below. Please confirm that this is acceptable to you and that, upon execution, you will withdraw your motion as to my client.

Yours,

Jonathan M. Shaw | Partner | DHILLON LAW GROUP

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From: John Anthony Castro <j.castro@johncastro.com>

Sent: Monday, October 16, 2023 7:15 PM

To: Jonathan Shaw (Dhillon Law) <JShaw@dhillonlaw.com>

Cc: 'Bryan Gould' <gouldb@cwbp.com>; 'barnardb@cwbp.com' <barnardb@cwbp.com>; 'tomaoc@cwbp.com' <tomaoc@cwbp.com>; David Warrington (Dhillon Law) <DWarrington@dhillonlaw.com>; Mark Meuser (Dhillon Law) <mmeuser@dhillonlaw.com>; 'gossil@cwbp.com' <gossil@cwbp.com>; 'barnardb@cwbp.com' <barnardb@cwbp.com>; 'Richard Lehmann' <rick@nhlawyer.com>; 'Morgan G. Tanafon' <TanafonM@cwbp.com>; 'Garland, Samuel' <Samuel.RV.Garland@doj.nh.gov>; 'Tekin, Jill' <Jill.Tekin@doj.nh.gov>; 'O'Donnell, Brendan' <Brendan.A.Odonnell@doj.nh.gov>

Subject: RE: Castro v. NH Secretary of State & Mr. Trump--Castro's Proposed Witness List

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Hi Jonathan,

Noted. I was unaware of the local rule and will confer on future motions.

I will amend the Motion to remove any reference to your client once we submit a joint stipulation of facts, which I'm sure we can do by tomorrow.

Have a nice evening.



John Anthony Castro
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From: Jonathan Shaw (Dhillon Law) <JShaw@dhillonlaw.com>

Sent: Monday, October 16, 2023 6:10 PM

To: John Anthony Castro <j.castro@johncastro.com>

Cc: 'Bryan Gould' <gouldb@cwbp.com>; 'barnardb@cwbp.com' <barnardb@cwbp.com>; 'tomaoc@cwbp.com' <tomaoc@cwbp.com>; David Warrington (Dhillon Law) <DWarrington@dhillonlaw.com>; Mark Meuser (Dhillon Law) <mmeuser@dhillonlaw.com>; 'gossil@cwbp.com' <gossil@cwbp.com>; 'barnardb@cwbp.com' <barnardb@cwbp.com>; 'Richard Lehmann' <rick@nhlawyer.com>; 'Morgan G. Tanafon' <TanafonM@cwbp.com>; 'Garland, Samuel' <Samuel.RV.Garland@doj.nh.gov>; 'Tekin, Jill' <Jill.Tekin@doj.nh.gov>; 'O'Donnell, Brendan' <Brendan.A.Odonnell@doj.nh.gov>

Subject: RE: Castro v. NH Secretary of State & Mr. Trump--Castro's Proposed Witness List

Mr. Castro,

I was surprised that you filed a motion to compel my client to appear at the hearing without first conferring with me, as required by the Local Rules. LR 7(c) ("Any party filing a motion

other than a dispositive motion shall certify to the court that a good faith effort has been made to obtain concurrence in the relief sought.”); LR 4.3(b) (Pro se “parties shall comply with these local rules...”).

Your motion does not explain why you contend that my client should be required to attend the hearing, but rather discusses only your reasons for wanting the Secretary of State and the Attorney General to appear. While I do not agree that your motion establishes a need for either of those gentlemen to appear, I will leave it to their counsel to deal with that aspect of your motion.

The only previous explanation of the testimony you hoped to elicit from my client is set forth in your October 6 email to Mr. O’Donnell, to which this email is a reply. Specifically, you wrote: “Donald John Trump. I intend to establish that Donald John Trump intends to file his Declaration of Candidacy and pay the \$1,000 filing fee either in-person or by mail postmarked between October 11 – 27 as required by state law.” My client will stipulate that he will file his Declaration of Candidacy and pay the \$1,000 filing fee by October 27, 2023. Accordingly, at least with respect to my client, your motion is moot. Please confirm that you will withdraw your motion with respect to my client.

Yours,

Jonathan M. Shaw | Partner | DHILLON LAW GROUP

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From: John Anthony Castro <j.castro@johncastro.com>
Sent: Friday, October 6, 2023 11:47 AM
To: 'O'Donnell, Brendan' <Brendan.A.Odonnell@doj.nh.gov>
Cc: 'Bryan Gould' <gouldb@cwbp.com>; 'barnardb@cwbp.com' <barnardb@cwbp.com>; 'tomaoc@cwbp.com' <tomaoc@cwbp.com>; David Warrington (Dhillon Law) <DWarrington@dhillonlaw.com>; Jonathan Shaw (Dhillon Law) <JShaw@dhillonlaw.com>; Mark Meuser (Dhillon Law) <mmeuser@dhillonlaw.com>; 'gossil@cwbp.com' <gossil@cwbp.com>; 'barnardb@cwbp.com' <barnardb@cwbp.com>; 'Richard Lehmann' <rick@nhlawyer.com>; 'Morgan G. Tanafon' <TanafonM@cwbp.com>; 'Garland, Samuel' <Samuel.RV.Garland@doj.nh.gov>; 'Tekin, Jill' <Jill.Tekin@doj.nh.gov>

Subject: RE: Castro v. NH Secretary of State & Mr. Trump--Castro's Proposed Witness List

Importance: High

External Email

Good Morning Brendan,

I will outline the intended purposes below:

1. John Michael Formella. I intend to establish that the New Hampshire Attorney General informed David Scanlan that state law pursuant to N.H. Rev. Stat. § 655:47 does not permit him to make a unilateral determination regarding an individual's constitutional qualifications. If Russian President Vladimir Putin submitted a Declaration of Candidacy pursuant to N.H. Rev. Stat. § 655:47, the position of the New Hampshire Attorney General is that, as the law states, the "names of any persons to be voted upon as candidates for president at the presidential primary shall be printed on the ballots upon the filing of declarations of candidacy." If you stipulate that the State's position is that anyone, including Russian President Vladimir Putin, who submits a Declaration of Candidacy must be printed on the ballot, I will forego calling John Formella as a witness. This is not intended to harass or embarrass John Formella; rather, it is to highlight the absurdity of the position and the need for judicial intervention. Because I doubt the state will stipulate to that fact, I suspect I will be compelled to still call him as a witness pursuant to Fed. R. Civ. P. 45(c)(1)(A).
2. David Michael Scanlan. I intend to establish that David Michael Scanlan accepted the conclusion of the New Hampshire Attorney General that he has absolutely zero discretion to determine eligibility even if Russian President Vladimir Putin submitted a Declaration of Candidacy with a \$1,000 filing fee. This is not intended to harass or embarrass David Michael Scanlan; rather, it is to highlight the absurdity of the position and the need for judicial intervention. Because I doubt the state will stipulate to that fact, I suspect I will be compelled to still call him as a witness pursuant to Fed. R. Civ. P. 45(c)(1)(A).
3. Donald John Trump. I intend to establish that Donald John Trump intends to file his Declaration of Candidacy and pay the \$1,000 filing fee either in-person or by mail postmarked between October 11 – 27 as required by state law. This is intended to neutralize any attempt by this thrice-indicted criminal defendant to mail in his documentation on October 27 via First Class "Snail" Mail with the intent to satisfying the mailbox rule but frustrating the ability of the Court to establish that we are both candidates on the ballot. This defendant is renowned for his cowardice in avoiding political debates and court appearances.



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From: O'Donnell, Brendan Brendan.A.Odonnell@doj.nh.gov
Sent: Friday, October 6, 2023 8:44 AM
To: John Anthony Castro, J.D., LL.M. j.castro@castroandco.com
Cc: Bryan Gould gouldb@cwbp.com; barnardb@cwbp.com; tomaoc@cwbp.com; dwarrington@dhillonlaw.com; jshaw@dhillonlaw.com; mmeuser@dhillonlaw.com; goss@cwbp.com; barnardb@cwbp.com; Richard Lehmann rick@nhlawyer.com; Morgan G. Tanafon TanafonM@cwbp.com; Garland, Samuel Samuel.RV.Garland@doj.nh.gov; Tekin, Jill Jill.Tekin@doj.nh.gov
Subject: Castro v. NH Secretary of State & Mr. Trump--Castro's Proposed Witness List

You don't often get email from brendan.a.odonnell@doj.nh.gov. [Learn why this is important](#)

Good morning Mr. Castro,

In your witness list below, you indicated that you intend to call Attorney General Formella and Secretary of State Scanlan as witnesses for the Court's hearing on standing.

Your witness list did not indicate what facts, if any, you may seek to elicit from these two witnesses. Depending on what facts you want to establish through these witnesses, it may be possible to stipulate to those facts, thereby obviating the need for attendance from these witnesses.

Would you please clarify your purpose in seeking to call these two witnesses and explain what facts you intend to establish through these witnesses?

Thank you,

Brendan

Brendan A. O'Donnell
Election Law Unit Chief
New Hampshire Department of Justice
33 Capitol St., Concord, NH 03301
brendan.a.odonnell@doj.nh.gov
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Direct Dial: 603-271-1269

From: ecf_bounce@nhd.uscourts.gov <ecf_bounce@nhd.uscourts.gov>
Sent: Thursday, October 5, 2023 5:47 PM
To: nef@nhd.uscourts.gov
Subject: Activity in Case 1:23-cv-00416-JL Castro v. NH Secretary of State et al Miscellaneous Filing

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U.S. District Court

District of New Hampshire

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The following transaction was entered on 10/5/2023 at 5:47 PM EDT and filed on 10/5/2023

Case Name: Castro v. NH Secretary of State et al

Case Number: 1:23-cv-00416-JL

Filer: John Anthony Castro

Document Number: 40

Docket Text:

Plaintiff's Corrected Witness List, Exhibit List, and Proposed Findings of Fact and Law Re Jurisdiction by John Anthony Castro(Castro, John)

1:23-cv-00416-JL Notice has been electronically mailed to:

Brendan Avery O'Donnell brendan.a.odonnell@doj.nh.gov, DOJ-CivilBureauCourts@doj.nh.gov, jill.tekin@doj.nh.gov

Bryan K. Gould gouldb@cwbp.com, barnardb@cwbp.com, tomaoc@cwbp.com

David Warrington dwarrington@dhillonlaw.com

John Anthony Castro j.castro@castroandco.com

Jonathan Mark Shaw jshaw@dhillonlaw.com

Mark Meuser mmeuser@dhillonlaw.com

Morgan Tanafon tanafonm@cwbp.com, barnardb@cwbp.com, gossil@cwbp.com

Richard J. Lehmann rick@nhlawyer.com

1:23-cv-00416-JL Notice, to the extent appropriate, must be delivered conventionally to:

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Document description:Main Document

Original filename:n/a

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9a8cad4abf054f6f44d4a9089d0c4186d8f41ded29a3a3fb512cbfd10f78]]